

### **ATTACHMENTS**

A Statement of the Substance of Interview is attached and incorporated within this amendment.

### **REMARKS**

Applicant notes with appreciation the opportunity to discuss the application telephonically with Examiner Paladini on September 26, 2005. This amendment is submitted to reflect content of that discussion. As such, entry of this amendment is requested to place the application in condition for allowance.

Currently, all the pending claims, claims 1-21, stand rejected under 35 U.S.C. §102(b) as anticipated by Virgil (U.S. 5,493,679). By way of this amendment, all of the independent claims, namely claims 1, 8, 14 and 19, have been amended not to limit the claims but rather to recite with greater clarity the inventive aspects that allow a neutral database to export data to specific graphics platforms independent of translation. As such, the neutral database has been amended to reflect that the database is “ordered into a part family sharing a parameter description between at least two parts within the part family.” Support for this amendment is found in the specification as filed at page 5, line 3 – page 6, line 6. Additionally, independent claims 1 and 8 have been amended to indicate that the database values are in fact parameter values. An explanation of parameter values as used herein is found in the instant specification at page 6, lines 7-15; and page 7, line 1 – page 8, line 8. As such, it is submitted that no new matter has been added to this application by way of this amendment.

Currently, claims 1-21 stand rejected under 35 U.S.C. §102(b) as being anticipated by Virgil (U.S. Patent 5,493,679). In particular, Virgil is cited for teaching found in Figures 3, 4a and 4b along with the text found at column 9, lines 63-65.

Applicant submits that Virgil fails to anticipate the pending claims on the basis of the current invention including a database having addressable cells that are indexed and exported by an export routine to a graphics platform operating only with data formatted in a way unique to that platform. As such, Applicant incorporates the remarks made of record in the amendment filed May 26, 2005. Additionally, the independent claims have been amended to emphasize database ordering "into a part family sharing a parameter description between at least two parts within said part family." (Independent claims 1, 8, 14 and 19). This database attribute facilitates exchange of data with graphics design platforms without the need for translation.

In contrast to the present invention, Virgil teaches the use of a series of specific design graphics platforms each operating with uniquely formatted data. This teaching is found at column 3, lines 15-45. Applicant submits that Virgil fails to teach the limitation of data exchange "independent of translation" since translation is specifically taught in this portion of the Virgil specification. The specific citations to Virgil with regard to Figures 3, 4a and 4b and column 9, lines 63-65 are submitted to describe aspects related to the CAD and WAN system described with regard to Figure 1 at column 3, lines 15-45. As such, Applicant submits that Virgil et al. always teaches data translation.

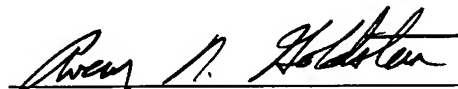
In view of the above remarks, reconsideration and withdrawal of the rejection as to claims 1-21 as anticipated by Virgil under 35 U.S.C. §102(b) is solicited.

#### **Summary**

Upon entry of this amendment, claims 1-21 remain pending in the application. All pending claims are now believed to be in allowable form and directed to patentable subject matter. Entry of this amendment is respectfully requested along with reconsideration of the outstanding rejection as to claims 1-21 as being anticipated by Virgil. Should any issues remain

in regard to this application, the Examiner is requested to contact the undersigned attorney in charge of this application to resolve any remaining issues.

Respectfully submitted,



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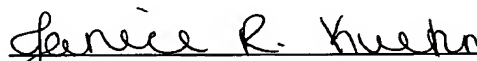
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DATE OF DEPOSIT October 10, 2005

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